

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FLASH-CONTROL, LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Civil Action No. 1:19-cv-1107-ADA

JURY TRIAL DEMANDED

DEFENDANT'S PROPOSED CLAIM TERMS FOR CONSTRUCTION

Pursuant to the procedural schedule entered October 23, 2019 (D.I. 30), Defendant Intel Corporation (herein “Intel”) hereby provides the following proposed claim term(s) for construction for exchange with Plaintiff Flash-Control, Inc. (herein “Flash-Control”)

As recited in US Patent No. 8,531,880 at claim 1:

- “said system further adapted to write said one or more changes from said second buffer to said volatile memory, thereby updating said one or more updated portions from said volatile memory to said first buffer, thereby updating said page stored therein to include said one or more changes associated with said one or more write request”

Intel reserves the right, consistent with the Federal Rules of Civil Procedure and the Local Rules of this Court, as well as any other applicable rule, to revise its proposed claim term(s) for construction, including the right to adopt and/or brief any claim terms for construction proposed by Flash-Control, and to reach compromise concerning any proposed claim term(s) for construction.

Dated: December 20, 2019

Respectfully submitted,

By: J. Stephen Ravel

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CERTIFICATE OF SERVICE

The undersigned certifies that on December 20, 2019 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

J. Stephen Ravel

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